

# memorandum

DATE: August 8, 1995

REPLY TO  
ATTN OF: Office of Nuclear Safety Policy and Standards:R. Stark:903-4407

SUBJECT: Interpretation Needed for DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports

TO: Walter B. Scott, Director  
Quality, Safety, and Health Programs Division  
Richland Operations Office

Your interpretation of DOE-STD-1027-92 as outlined in your memo of July 20, 1995, is consistent with the position of this Office. Adjusting release fractions for the Category 3 thresholds to alter facility categorization is not justifiable based on the model used to generate those values. Additionally, such exercises do not serve any safety purpose.

However, a facility may refine their categorizations as a part of Final Hazard Categorization. Here, the Safety Analysis Report (SAR) analysis must show that the facility falls below the 5480.23 threshold for Category 3. That is, after the energy sources and process that might contribute to the generation or uncontrolled release of hazardous materials are analyzed, one finds the potential for significant localized consequences does not exist. In addition, the Cognizant Secretarial Officer maintains authority to grant exemptions to the SAR Order via his/her responsibilities under DOE 5480.23 - recategorization from Category 3 to radiological would fall under this authority. Such appeals should be accompanied by an analysis justifying that a facility does not pose "significant localized consequences" (per 5480.23 definition). This analysis should rely on actual energy sources and hazards at the facility to make an argument that the facility poses no "significant localized effects" but not on how the release fractions should be changed.

/s/

Richard L. Black, Director  
Office of Nuclear Safety  
Policy and Standards

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